

K&L GATES LLP

Peter N. Flocos
K&L Gates LLP
599 Lexington Avenue
New York, NY 10022-6030
Phone: 212.536.4025
Fax: 212.536.3901
Email: peter.flocos@klgates.com

B. John Casey (admitted *pro hac vice*)
K&L Gates LLP
One SW Columbia St., #1900
Portland, OR 97258
Phone: 503-226-5716
Email: john.casey@klgates.com

*Counsel for Defendants 6D Global Technologies,
Inc., 6D Acquisitions, Inc., and Tejune Kang*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN COTTAM,

Plaintiff,

v.

GLOBAL EMERGING CAPITAL GROUP,
LLC; ALEXANDER KIBRIK; WILLIAM
UCHIMOTO; 6D GLOBAL
TECHNOLOGIES, INC.; 6D
ACQUISITIONS, INC., and TEJUNE KANG,

Defendants.

Case No. 1:16-cv-04584 (RJS)

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT BY
DEFENDANTS 6D GLOBAL
TECHNOLOGIES, INC., 6D
ACQUISITIONS, INC., AND TEJUNE
KANG**

PLEASE TAKE NOTICE that, upon the accompanying 6D Defendants' Memorandum of Law in Support of Motion to Dismiss Plaintiff's Complaint, the Declaration of B. John Casey and accompanying exhibits, and all other papers and proceedings herein, Defendants 6D Global Technologies, Inc., 6D Acquisitions, Inc., and Tejune Kang (collectively, the "6D Defendants"), will move this Court, before the Honorable Richard J. Sullivan, United States District Judge for

the Southern District of New York, on a date and at a time designated by the Court, for an Order dismissing Plaintiff's Complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and awarding such other and further relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's Order dated September 14, 2016 (Dkt. No. 42), Plaintiff shall file his opposition papers by October 12, 2016 and the 6D Defendants shall file their reply papers by October 26, 2016.

September 21, 2016.

Respectfully submitted,

By: s/ Peter N. Flocos
Peter N. Flocos
K&L Gates LLP
599 Lexington Avenue
New York, NY 10022-6030
Phone: 212.536.4025
Fax: 212.536.3901
Email: peter.flocos@klgates.com

B. John Casey, admitted *pro hac vice*
K&L Gates LLP
One SW Columbia Street, Suite 1900
Portland, OR 97258
Tel.: (503)-228-3200
Email: john.casey@klgates.com

*Attorneys for Defendants 6D Global Technologies,
Inc., 6D Acquisitions, Inc., and Tejune Kang*

To: All Counsel of Record via CM/ECF